

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Royce Bevel, Plaintiff, -v- Refrigerated Transfer Carrier LLC, Defendant.	Civ. Action #: 22-CV-08195 (JLR)(RWL) <u>ACCEPTANCE OF RULE 68 OFFER OF JUDGMENT</u>
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TO: Forchelli, Deegan & Terrana LLP

By: Mr. Gregory S. Lisi, Esq.
Counsel for Defendant
333 Earle Ovington Boulevard, Suite 1010
Uniondale, NY 11553
Tel: 516-248-1700
Email: glisi@forchellilaw.com

PLEASE TAKE NOTICE that Plaintiff Royce Bevel pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby accepts the attached Seven Thousand Five Hundred Dollars (\$7,500), Offer of Judgment of Defendant Refrigerated Transfer Carrier LLC, dated December 7, 2022, in the above-entitled action.

Dated: Queens Village, New York
December 8, 2022

Respectfully submitted,

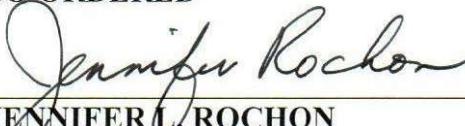
Abdul Hassan Law Group, PLLC

/s/ Abdul K. Hassan
Abdul K. Hassan, Esq. (AH6510)
Counsel for Plaintiff Royce Bevel
215-28 Hillside Avenue
Queens Village, NY 11427
Tel: 718-740-1000
Fax: 718-740-2000

Judgment shall be entered in favor of Plaintiff against Defendant in the amount of \$7,500.

Dated: December 9, 2022
New York, New York

SO ORDERED



JENNIFER L. ROCHON
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROYCE BEVEL,

Case No.: 22-cv-08195 (JLR)

Plaintiff,

-against-

RULE 68 OFFER IN JUDGMENT

REFRIGERATED TRANSFER CARRIER LLC,

Defendant.

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To:

Abdul K. Hassan, Esq.
Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, NY 11427
Fax: 718-740-2000
Email: abdul@abdulhassan.com

1. Pursuant to Rule 68 of the Federal Rules Of Civil Procedure, Defendant Refrigerated Transfer Carrier LLC (“Defendant”) hereby offers to allow judgment to be taken against it for all claims raised in the Complaint dated filed in the above-captioned matter by plaintiff Royce Bevel (“Plaintiff”), for the sum of \$7,500.00, inclusive of all unpaid minimum wages, unpaid overtime, unlawful wage deductions, failure to provide wage statements and wage notices, spread of hours pay, liquidated damages, statutory penalties, any other wage and hour claims, pre-judgment interest, attorneys’ fees and costs.

2. This Offer of Judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and shall not constitute or operate as an acknowledgement or admission of any kind by Defendant that is has: (a) committed any unlawful, unprofessional or unethical practice; (b) violated any federal, state or local statute, regulation; and/or (c) breached any

obligation or otherwise incurred any liability to Plaintiff or to any other individual(s) for the reasons alleged in this action.

3. This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure and evidence of this offer is not admissible.

4. If this offer is not accepted in writing within fourteen (14) days after it is served, it will be deemed withdrawn.

Dated: December 7, 2022
Uniondale, NY

FORCHELLI DEEGAN TERRANA LLP

By: Gregory S. Lisi
Attorneys for Defendant
333 Earle Ovington Boulevard, Suite 1010
Uniondale, NY 11553

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Royce Bevel, Plaintiff, -v- Refrigerated Transfer Carrier LLC, Defendant.	Civ. Action #: 22-CV-08195 (JLR)(RWL) PROOF OF SERVICE (Acceptance-Offer of Judgment)
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I, ABDUL KARIM HASSAN, ESQ., an attorney duly admitted to practice before this Court and a member of the Bar of the State of New York, states the following under penalty of perjury:

1. I am legal counsel to Plaintiff in the above-entitled action;
2. That on the 8th day of December 2022, I served plaintiff's acceptance of defendant within offer of judgment, in the above-entitled action, by serving a true and correct copy therefore on counsel of record for Defendant, via USPS mail, from within the State of New York to:

TO: **Forchelli, Deegan & Terrana LLP**
Mr. Gregory S. Lisi, Esq.
333 Earle Ovington Boulevard, Suite 1010
Uniondale, NY 11553

I am over the age of 18 and not a party to this action.

Dated: Queens Village, New York
December 8, 2022

Abdul Hassan
Abdul K. Hassan, Esq. (AH6510)
Counsel for Plaintiff Royce Bevel
215-28 Hillside Avenue
Queens Village, NY 11427
Tel: 718-740-1000
Fax: 718-740-2000